

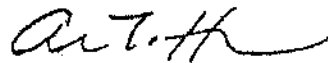
DECLARATION OF ALEXANDER HOLTZMAN, ESQ.

1. My name is Alexander Holtzman. I am a Staff Attorney at the non-profit organization Safe Passage Project in New York City.
2. I am the attorney for FCA, A#xxx-xx9-417, a young indigenous boy from Guatemala. FCA loves to play and watch soccer. FCA is 16 years old. FCA entered the country with his father, Mr. ACO (alien number unknown). Per information and belief, in or about June 2018, FCA and his father were separated from each other near the U.S.-Mexico border.
3. FCA is currently in the custody of the Office of Refugee Resettlement (ORR). He resides at an ORR-contracted childcare facility.
4. On July 10, 2018, I interviewed FCA at this ORR facility. During our meeting, FCA stated that he has been unable to speak to his father since they were separated around one month and ten days ago. Based on my observations of FCA, and per my information and believe, this separation has had evident, concrete effects on FCA's mental health; FCA appeared despondent and depressed, and several times during our meeting, he put his head in his hands and cried.
5. During our July 10 meeting, FCA expressed fear of returning to Guatemala and stated that he very much wants to remain in the United States. FCA also stated that he very much wants to reunify with his father, who, per information and belief, is currently detained in immigration detention in Texas. FCA's preference is to reunify with his father outside of a detention facility so that they can both pursue legal relief. However, if faced with a choice between reuniting with his father and returning to Guatemala, reuniting with his father and remaining in detention, or being separated from his father but staying

10. If FCA is moved from the state of New York, it is likely that he will no longer have access to existing counsel. I work for a non-profit legal services organization, the Safe Passage Project, that does not have the funds to pay for travel outside of the New York metropolitan area. FCA's efforts to apply for the immigration relief for which he may be eligible may be delayed or otherwise hindered.
11. If FCA is not reunified with his father, FCA's father will not be able to participate in the preparation of his son's legal case.
12. FCA's continued separation from his father constitutes a specific, concrete harm and inhibits FCA's ability to make decisions regarding his case. In my opinion and based upon my observations, this has a serious negative effect on his mental health. Reunification with his father will remedy these harms.
13. If you have additional questions about this case, please contact me at 212-324-6558 or by email at aholtzman@safepassageproject.org.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: July 15, 2018



Alexander T. Holtzman, Esq.
Staff Attorney
Safe Passage Project